

Message

From: DePasquale, Daniel [depasquale.daniel@epa.gov]
Sent: 11/17/2017 7:41:21 PM
To: Miles, James [miles.james@epa.gov]; Milton, Philip [Milton.Philip@epa.gov]
Subject: RE: R3 targets
Attachments: Region 3 Targeting 2017 11-17-17.docx

Attached is the latest draft. James, I left your comments there, along with my responses. If it looks good, then I will delete them and send back the final document. Let me know if there is anything else I can do.

Thanks,
Dan

From: Miles, James
Sent: Friday, November 17, 2017 2:14 PM
To: DePasquale, Daniel <depasquale.daniel@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: R3 targets

If we don't get it out today, that's fine

From: DePasquale, Daniel
Sent: Friday, November 17, 2017 2:13 PM
To: Miles, James <miles.james@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>
Subject: RE: R3 targets

Yes, I am working on it now, and will be done by end of day (at the latest). I will send changes to the both of you.

From: Miles, James
Sent: Friday, November 17, 2017 2:12 PM
To: Milton, Philip <Milton.Philip@epa.gov>; DePasquale, Daniel <depasquale.daniel@epa.gov>
Subject: RE: R3 targets

Thanks for your review. I like your comments. Dan, can you turn around another draft in line with this?

Phil – how do you feel about sharing your mega list to Region 3 at the moment? We can say we're going to narrow it by **Ex. 5 DP / Ex. 7(A)** as appropriate, and will circle back.

From: Milton, Philip
Sent: Friday, November 17, 2017 1:58 PM
To: Miles, James <miles.james@epa.gov>; DePasquale, Daniel <depasquale.daniel@epa.gov>
Subject: RE: R3 targets

Draft Agency Deliberative Process – Please do not release

James and Dan –

Thanks for allowing me to review the document. My 1st comment is mostly stylistic. I think the opening ¶ could more bluntly state the that the universe of potential targets were identified solely from the following areas...

Ex. 5 DP / Ex. 7(A)

Ex. 5 DP / Ex. 7(A)

Addition data on: (1) size of facility; (2) proximity to water; (3) EJ community; (4) proximity to other facilities that may warrant inspections; and, (5) history of noncompliance was pulled to help evaluate the potential targets.

For your consideration is a re-write below...

Ex. 5 DP / Ex. 7(A)

Other comments...

Facility (17) has made large disclosures under eDisclosure, and received acknowledgement letter... so "if and when" we consider enforcement at this facility we have committed to evaluating the disclosures against the audit policy.

Facilities (25) and (26) didn't jive with my [redacted] data... the list says they reported [redacted] Ex. 5 DP / Ex. 7(A) showed no report.

It doesn't reflect the "mega" list I have of potential [redacted] non-reporters (though this may be pre-mature).

If you have any questions, please do not hesitate to contact me.

V/r

Phil

Philip L. Milton

Chemical Engineer | U.S. Environmental Protection Agency

Office of Enforcement & Compliance Assurance | Office of Civil Enforcement | Waste and Chemical Enforcement Division | Chemical Risk and Reporting Enforcement Branch

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From: Miles, James

Sent: Friday, November 17, 2017 12:38 PM

To: DePasquale, Daniel <depasquale.daniel@epa.gov>; Milton, Philip <Milton.Philip@epa.gov>

Subject: R3 targets

I did a lot of reformatting/editing, but didn't track in redline. I did raise some questions for you Dan.

Before you consider those Dan, I asked Phil if he could take a look.

Many thanks

James Miles, Chief

Chemical Risk and Reporting Enforcement Branch

Waste and Chemical Enforcement Division

Office of Civil Enforcement

Office of Enforcement and Compliance Assurance

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